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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

PRINCE BRELAND, ANNIE COLEMAN and MAXIME DIATTA, individually and on behalf of all others similarly situated, Plaintiffs, v. GEOFFREY ZAKARIAN, COUNTRY IN NEW YORK, LLC, ADAM BLOCK, 3SIXTY HOSPITALITY, LLC and MOSHA LAX, Defendants.	Case No.: 08-CV-6120 (DF) **DECLARATION OF STACY ROE**

I, Stacy Roe, declare as follows:

1. I am a Senior Project Administrator for Rust Consulting, Inc. ("Rust"). My business address is 625 Marquette Avenue, Suite 880, Minneapolis, Minnesota 55402-2469. My telephone number is (612) 359-2812. I am over twenty-one years of age and am authorized to make this declaration on behalf of Rust and myself.

2. Rust has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance and consumer issues. We have provided notification and/or claims administration services in more than 3,000 cases. Of these, more than 1,200 were Labor & Employment cases.

3. Rust was engaged by Counsel to provide notification services in the *Breland, et al. v. Zakarian, et al.* Settlement (the "Settlement"). Duties included: a) preparing, printing and mailing of the *Notice of Proposed Settlement of Class Action Lawsuit and Fairness Hearing* ("Class Notice"); b) tracking of requests for exclusion; c) drafting and mailing Settlement Award checks to Class Members; and for such other tasks as the Parties mutually agree or the Court orders Rust to perform.

4. Rust obtained a mailing address of Breland, et al. v. Zakarian, et al., Claims Administrator, c/o Rust Consulting, Inc., P.O. Box 2396, Faribault, Minnesota 55021-9096 to receive requests for exclusion and undeliverable Class Notices.

5. Rust obtained a phone number of 1 (877) 294-7051 for Class Members to call with questions regarding the Settlement.

6. On or about March 2, 2012, Rust received text for the Class Notice from Counsel for *Breland, et al. v. Zakarian, et al.* A draft of the Class Notice was prepared by Rust and approved by the Parties.

7. On or about March 12, 2012, Counsel for Defense provided Rust with a mailing list (the "Class List") containing the Class Member's names, last known addresses, Social Security Numbers, and estimated Settlement awards. The Class List contained data for 125 potential Class Members.

8. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database ("NCOA") maintained by the U.S. Postal Service. The NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA would be utilized in connection with the mailing of the Class Notice.

9. On March 16, 2012, Class Notices were mailed to 125 Class Members contained in the Class List via First Class mail. The Class Notice advised Class Members that they could do nothing and remain in the Class or request exclusion post-marked by May 15, 2012.

10. As of this date, Rust has received 16 undeliverable Class Notices. Of the 16 undeliverable Class Notices, Rust performed address traces on 16 undeliverable Class Notices. The address trace utilizes the Class Member's name, previous address and Social Security Number for locating a current address. Of the 16 traces performed, nine (9) updated addresses were obtained and Class Notices were promptly re-mailed to those Class Members via First Class mail. Of the nine (9) updated addresses mailed to from trace, four (4) were returned as undeliverable.

11. Rust is responsible for receipt of all requests for exclusion from the Settlement. As of this date, Rust has received zero (0) requests for exclusion.

12. As of this date, zero (0) objections were received by Rust.

13. The total cost for the administration of this Settlement, including fees incurred and future costs for completion of the administration is estimated to be $8,000.00.

14. I declare under penalty of perjury under the laws of the State of New York and the United States that the above is true and correct to the best of my knowledge and that this Declaration was executed this 29th day of May 2012, at Minneapolis, MN.

Stacy Roe

STACY ROE